REMARKS

Claims 1, 3, 6, 12, 18, and 19 are amended. Claims 1-22 remain in the Application. Reconsideration of the pending claims is respectfully requested in view of the above amendments and the following remarks.

I.   Claim Objections

Claim 3 is objected to because its base Claim 1 does not recite that a graphics card is in the isolated execution mode.

Claim 3 is amended to correct typographical errors and to promote clarity. The word "an" is inserted before "isolated access mode." Applicants submit that Claim 3, as originally filed, recites "isolated **access** mode" instead of "isolated **execution** mode" as indicated by the Examiner. Thus, the objected portion of Claim 3 "when a graphics card is in isolated **execution** mode" does not exist in Claim 3, either before or after the current amendments. Moreover, Claim 1 should not be construed as to limit the isolated execution mode to only the processor. Claim 1 does not recite that other components of the platform cannot execute in the isolated execution mode. Thus, withdrawal of the objection is respectfully requested.

II.   Claims Rejected Under 35 U.S.C. § 101

Claims 1, 2, 7-10, and 12-13 stand rejected under 35 U.S.C. § 101 as lacking patentable utility. With respect to Claim 1 and its dependent claims, Applicants submit that the claimed platform provides a secure hardware environment for output data by supporting the isolated execution mode and the isolated output area. Thus, the claimed platform produces a useful, concrete, and tangible result of secure output data.

With respect to Claim 12 and dependent Claim 13, the claimed method protects output data by preventing access to the output data by any requester not operating in the isolated execution mode. Thus, the claimed method produces a useful, concrete, and tangible result of protected output data.

Thus, withdrawal of the rejection is respectfully requested.

III.   Claims Rejected Under 35 U.S.C. § 112

Claims 1, 2, 7-10, and 12-13 stand rejected under 35 U.S.C. § 112, second paragraph as being incomplete for omitting essential elements. Applicants submit that the above amendments

to Claims 1 and 12 supply the relationships between the constituent components to perform the actions of the claims. Thus, withdrawal of the rejection is respectfully requested.

IV.   Claims Rejected Under 35 U.S.C. § 102

Claims 1, 6, 12-13, 15-16, and 19-22 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,775,779 issued to England et al. ("England").

To anticipate a claim, the Examiner must show that a single reference teaches each of the elements of that claim. Applicants submit that England at least does not teach the "isolated execution circuit to provide hardware support for the isolated execution mode" as claimed in amended Claim 1.

England discloses a software structure for protecting premium content in a nonsecure computer environment (Abstract and FIG. 4). The disclosed computer environment does not provide any hardware support for protecting memory contents. Instead of using hardware, the teaching of England relies entirely on **software** modules for content protection. There is no notion of providing hardware protection in England. In fact, England's disclosure is premised on the assumption that the hardware environment is nonsecure (Abstract). Thus, England does not teach providing **hardware** support for the isolated execution mode as claimed.

Moreover, England explicitly discloses that processor modes change automatically, without the involvement of any hardware. In a paragraph describing processor mode transitions, England discloses that the mode of a processor is tied directly to the code that is executing (col. 10, lines 13-16). Thus, the mode changes automatically (col. 10, line 17). There is no hardware involved when a processor enters a user mode or a secure kernel mode. Thus, the teaching of England totally lacks hardware support for the isolated execution mode. Thus, England does not teach each of the elements of amended Claim 1.

Analogous discussions apply to independent Claims 12 and 19, which are amended to include similar limitations.

In regard to Claims 6, 13, 15-16, and 20-22, these claims respectively depend from Claims 1, 12, and 19, and incorporate the limitations thereof. Thus, at least for the reasons mentioned above in regard to Claim 1, England does not anticipate these claims. Accordingly,

reconsideration and withdrawal of the § 102 rejection of Claims 1, 6, 12-13, 15-16, and 19-22 are respectfully requested.

V.   Claims Rejected Under 35 U.S.C. § 103(a)

A.   Claims 2-5, 7-11, 14 and 17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,775,779 issued to England et al. ("England"). Applicants respectfully traverse the rejection.

To establish a *prima facie* case of obviousness, the relied upon references must teach or suggest every limitation of the claim such that the invention as a whole would have been obvious at the time the invention was made to one skilled in the art. Claims 2-5, 7-11, 14 and 17 respectively depend from Claims 1 and 12, and incorporate the limitations thereof. Thus, for at least the reasons mentioned above in regard to Claim 1, England does not teach or suggest each of the elements of these dependent claims.

Moreover, with respect to Claim 3, the Examiner characterizes the memory manager of England as the claimed memory control hub (MCH). However, the memory manager is a not a hardware device coupled between the system memory, the processor, and the graphics card. Rather, the memory manager is a software module stored in the system memory. Thus, the physical location and the structure of the memory manager are totally different from the claimed MCH. Thus, England does not teach or suggest each of the elements of Claim 3 for this additional reason.

With respect to Claim 17, England does not teach or suggest "occluding all windows but the first window." Applicants have carefully reviewed the cited passage and the disclosure in general but have been unable to identify any part of the disclosure that mentions occluding windows. Applicants request that the Examiner point out the specific location of such teaching in the disclosure.

Accordingly, reconsideration and withdrawal of the § 103 rejection of Claims 2-5, 7-11, 14 and 17 are requested.

B.   Claim 18 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over England in view of U.S. Patent No. 6,476,806 issued to Cunnif et al. ("Cunnif").

Claim 18 depends from Claim 12 and incorporates the limitations thereof. Thus, for at least the reasons mentioned above in regard to Claim 12, England does not teach or suggest each of the elements of Claim 18. Cunnif does not cure the defects of England. Cunnif is relied on for disclosing image occlusion. However, Cunnif does not teach or suggest providing hardware support for the isolated execution mode as recited in base Claim 12. Moreover, the image occlusion in Cunnif is disclosed in the context of computer graphics display, which is totally unrelated to the claimed "isolated execution mode." Thus, a skilled person would not be motivated to combine England with Cunnif, because the two references are in diverse technical fields. Thus, England in view of Cunnif does not teach or suggest each of the elements of Claim 18.

Accordingly, reconsideration and withdrawal of the § 103 rejection of Claim 18 are requested.

CONCLUSION

In view of the foregoing, it is believed that all claims now are now in condition for allowance and such action is earnestly solicited at the earliest possible date. If there are any additional fees due in connection with the filing of this response, please charge those fees to our Deposit Account No. 02-2666.

Respectfully submitted,

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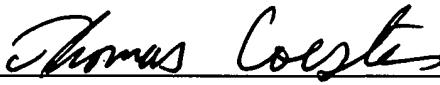
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